

## **Module 21**

# **Labeling and Marking**

### **OBJECTIVES**

1. List, define, or describe the basic label features and give the requirements of each.
2. Define the following:
  - a. Labeling (label)
  - b. Marking
  - c. Branding
  - d. Container
  - e. Immediate container
  - f. Shipping container
  - g. Packaging material
  - h. Misbranded
  - i. Spring lamb
3. Describe the procedure to determine if a given label has been approved and the action required if it has not been approved.
4. Explain the purpose of a label, and why a label control program is necessary.
5. List and define two categories of LRB approvals.
6. Select from a list of labeling responsibilities those that must be assumed by the plant and those that must be assumed by inspection personnel.
7. List inspection responsibilities regarding the security, inventory, and destruction of brands.
8. Match a chart of primal parts with the correct label names.
9. List the minimum and maximum required marks on carcasses, primal parts, and related allied products.
10. Given a facsimile of an inspection legend or brand, list the products on which it may be used.
11. Describe how products can be shipped unbranded.

12. List a requirement that products must meet when USDA quality grades are displayed on labels.
13. Select the marking or labeling requirements for carcasses and/or parts that are tendered with papain.
14. State if brands or containers bearing the mark of inspection can be used without an inspector on duty.
15. Identify the labeling requirements for a shipping container.
16. Identify special handling statements, safe handling instructions, and the products on which they are required.
17. Given 10 net weights of a group 5 product, record net weight results on the FSIS Form 7240-1, and determine whether or not the products pass or fail net weight requirements.

## **MODULE 21**

## **LABELING AND MARKING (305)**

### **INTRODUCTION**

It is the responsibility of the meat and poultry inspection program to assure the consuming public that all products are properly packaged, identified, and are not misleading or deceptive in content, ingredients, marking, labeling and packaging. It is normal for consumers to expect that any product bearing the mark of inspection is free of disease and adulteration, and is clean, wholesome, and truthfully labeled.

### **MARKING AND LABELING**

There are different sections in the Manual and Regulations pertaining to marking and labeling. Part 16 in the Manual and sections 312 and 316 in the Regulations pertain to marking. Part 17 in the Manual and section 317 in the regulations pertain to labeling. We will distinguish between marking and labeling by giving the definition of each.

- Marking is the application of lettering (e.g., the mark of "inspection") or the affixing of tags directly onto products.
- Labeling is a very broad term referring to product identification, and includes both marking and labels. A label is the display of any printing, lithographing, embossing, stickers, seals, or any other written, printed, or graphic matter upon the immediate container (not including package liners) of any product.

### **BRANDING**

When product is branded, it has actually been marked the with an official inspection legend (sometimes referred to as a bug). It is the responsibility of inspection to monitor the brand markings applied by the establishment to carcasses or cuts of meat. Inspection must assure that brand markings are legible and that each piece - whether it is a whole carcass, side, quarter, or primal part - bears a minimum of one brand. There is no maximum limit to the number of brands that may be applied. Products are not required to be branded when shipped in properly labeled containers or when shipped under an official government seal.

Inspection personnel must always control all official brands. The following security requirements must be met:

- Official brands must be kept under government lock and/or seal during non-operational hours.
- The IIC must complete an Authorization Certificate, Form MP 216, when an establishment wishes to order new brands. This form is a security item.
- The IIC must maintain a current inventory of all official brands by size, type, and serial number.
- The IIC will supervise the destruction of damaged or unserviceable brands and record the disposal on the current inventory.
- Official brands may only be used under the supervision of a program employee. This means that inspection personnel must be on duty.

Other markings that may be applied to carcasses and cuts, provided they meet the requirements, include U.S. quality grades (Prime, Choice, Select, etc), "spring lamb", and "tendered with papain". The ink for marking products is furnished by the establishment and is made from approved, harmless ingredients.

Markings may also be applied to outside containers. For example, glands and organs which are not used for human food purposes can be packed in containers marked with the phrase "for pharmaceutical purposes", or "for organo-therapeutic purposes".

## **LABEL APPROVAL AUTHORITY**

The Federal Meat Inspection Act (FMIA) gives FSIS the authority for a label control program. Before a label can be used, it must be approved (either by FSIS or the establishment) and must be used under inspection supervision. Reasons for a label control program are as follows:

- To require informative labeling by identifying to the consumer the name of the product, the product's ingredients, quantity, manufacturer; and how the product is to be handled to maintain wholesomeness.
- To prohibit the use of any false or misleading labels.

- To prevent the adulteration of products by requiring a standard of identity stating what the product can or cannot contain or amounts of ingredients it must contain, or limiting restricted ingredients.
- To prevent any unfair trade practices.

Regardless of who owns the establishment or where the establishment is located, all establishments under federal and/or state inspection must comply with the same requirements and standards for labels; therefore uniformity is established through the label control program.

### **LABEL APPROVAL BY LRB**

An establishment may submit any label, marking, or sketch directly to the Labeling Review Branch (LRB) in Washington, D.C. for official approval. For each label or sketch submitted, the establishment completes an FSIS Form 7234-1, Application for Approval of Labeling, Marking, or Device, in duplicate, and attaches the label, marking, or sketch to each copy of the form. The application may be mailed directly to LRB from an establishment (at their expense, NOT in government franked envelopes), hand carried to LRB label review personnel by an expeditor (acting as a representative of the establishment), or it may be submitted to Washington from a central labeling office, as may be the case in large companies with several establishments located throughout the country. An establishment may submit a label to the IIC for his or her review prior to submittal to LRB, but this is not required.

### **TYPE OF LABEL APPROVALS**

The FSIS Labeling Review Branch (LRB) in Washington, D.C. has the primary responsibility to review and approval labels. The IIC does not have the authority to approve labeling, however, the IIC may approve meat carcass ink brands and burning brands. LRB label approvals are of two types: sketch and temporary.

- SKETCH LABELING - a “sketch” is a printers proof or equivalent which clearly shows all label features, size, location, and indication of final color. LRB will accept sketches that are hand drawn, computer generated, or other reasonable facsimiles that clearly reflect the final version of the label. Once a label has been approved as a sketch, the establishment may have the label printed in its final form and begin using it without formal FSIS approval as long as it complies with the regulations.
- TEMPORARY - “temporary” approval is for labeling that is deficient in some manner and is given only under the following circumstances:

1. The proposed labeling would not misrepresent the product.
2. The use of the labeling would not pose any potential health, safety, or dietary problems for the consumer.
3. Denial of the request would create undue economic hardship.
4. An unfair competitive advantage would not result from the granting of the temporary approval.

Temporary approvals are granted for periods not to exceed 180 days.

### **GENERICALLY APPROVED LABELS**

An establishment is authorized to use certain types of labels without submitting them to LRB for approval, provided that the labeling is in accordance with the regulations 317.5, 317.2 and is not false or misleading. Some examples of labeling which may be generically approved include:

1. Single ingredient products which contain no special claims or guarantees.
2. Labeling for shipping containers which contain one or more fully labeled immediate containers
3. Inspection legends
4. Labeling for product containers sold under contract specifications to federal government agencies
5. Labeling for products not intended for human food
6. Inserts, tags, liners, pasters, containing printed or graphic material for use on, or to be placed within containers, provided such devices contain no reference to the product and bear no misleading feature
7. Labeling for products which have a product standard as specified in part 319 of the regulations or in the Labeling Policy Book
8. Labeling for consumer test products not intended for sale
9. Labeling which was previously approved by LRB as a sketch and the final labeling was prepared without modification or with minor changes as allowed in 317.5 (9)

### **LABELING RECORDS**

The establishment has the responsibility to establish and maintain a record of all labeling that is used for meat and poultry products under their control. Labeling records must be made available to FSIS field personnel and any authorized USDA official upon request. If a corporation conducts business at multiple locations, labeling records may be kept at the headquarters office. When an LRB audit is being conducted, labeling records must be available within 24 hours. Each label record must consist of the actual product label (including any

generic labeling and sketch approvals ), the product formulation, and processing procedures. FSIS does not require a specific label filing system and records for generic approvals do not have to be completed on the FSIS Form 7234-1, Application for Approval of Labels, Marking, or Device. However, labeling submitted to LRB for approval must be completed on FSIS Form 7234-1.

## **REQUIRED LABEL FEATURES**

Labels of all products must show certain required features on the principal display panel.

The required label features include the following:

- Product Name
- Ingredient Statement (if needed)
- Inspection Legend and establishment number
- Net weight statement
- Signature line (manufacturer's or distributor's name and address)
- Handling statement (if needed)
- Nutrition labeling (if needed)
- Safe handling instructions (if needed)

The name of the product must be one for which a definition and standard of identity has been established and of which the consumer has knowledge. For example, in the packing industry "picnic" is the common name for a product, but since it is not known by the consumer, it would not be acceptable. It must be labeled as "pork shoulder picnic."

The ingredient statement, if composed of two or more ingredients, must show the common or usual name of each in the descending order of predominance (by weight) at the time of product preparation.

The name and address of the manufacturer must be shown on the label by city, state, and postal zip code. This is often called the signature line. The street address is not required if the business is listed in the local telephone directory.

The name of the distributor may be shown in lieu of the manufacturer if shown with a phrase such as "prepared for."

The official inspection legend indicates the product was inspected and passed. The official inspection legend and the establishment number are the only features required on a shipping container. The use of a foreign language on a label is acceptable provided the inspection legend and establishment number are in English. The official establishment number may be omitted from the inspection legend and located elsewhere on the container of certain packaging. For example, the number may be located on the end panel of a bacon package; on the metal clip of a sausage chub; or on the embossed lid of a canned product.

The handling statement, such as "keep refrigerated", "keep frozen", "perishable", or "keep under refrigeration" is required on the label of packaged product to indicate that the product must have special handling to maintain its wholesome condition.

Nutrition labeling is required on most further processed products. It is voluntary for raw meat and poultry products but producers are encouraged to supply nutrition labeling. The nutrition labeling will usually be shown on the principal display panel or on an information panel. The information presented includes the serving size, servings per container, and the calories, fat, protein, carbohydrate, and sodium per serving.

Safe Handling Instructions are required on all labels for products that are not processed to the point of being "ready to eat" and which are sold to consumers, hotels, restaurants, and similar institutions. This would include raw meat and poultry products. The Safe Handling Instructions include a graphic display of pictures along with information on keeping foods refrigerated, keeping product contact surfaces clean, cooking thoroughly, and keeping cooked foods hot.



## **Module 21**

### **Labeling and Marking**

#### **SUPPLEMENT**

1. Define shipping container (Reg 301.2).
2. Define immediate container (Reg 301.2).
3. Define spring lamb (Reg 317.8).
4. List at least three methods a plant may use to submit a label for approval.
5. Define misbranded (Reg 301.2).
6. Define packaging material (Reg 301.2).

7. An establishment may submit labels for approval through a central labeling office.
  - a. True
  - b. False
8. Define marking.
9. List the required features of a label; identify which may be handwritten; and if the label is written in a foreign language, identify which features must be written in English.
10. List the source(s) of authority for the labeling control program.
11. In what order must ingredients be listed in the ingredient statement of a label?
12. List required labeling features that must appear on a shipping container.
13. Carcasses of animals injected with papain shall be marked "Tendered

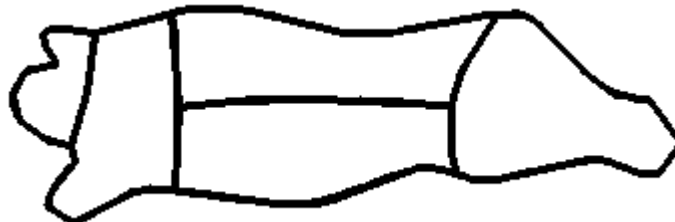
with Papain” applied by a roller brand over which primal parts?  
(Directive 6810.2)

14. If wholesale or retail cuts are labeled using grade names (i.e. prime, choice, select, etc.), what is required of such cuts?
15. Mark the following statements as True or False
- \_\_\_ a. Marking is a type of labeling.
  - \_\_\_ b. The IIC may approve labels.
  - \_\_\_ c. The IIC must maintain a file of approved labels.
16. Mark an 'X' beside those products that must be branded when shipped.
- \_\_\_\_\_ Beef livers in properly labeled containers.
  - \_\_\_\_\_ Trimmings in properly labeled containers.
  - \_\_\_\_\_ Unpackaged primal parts.
  - \_\_\_\_\_ Beef tongues in properly labeled containers.
  - \_\_\_\_\_ Primal parts in properly labeled containers.
  - \_\_\_\_\_ Hanging carcass of beef
  - \_\_\_\_\_ Unmarked product that has been inspected and passed and is being shipped in a railroad car or truck under an official government seal.
17. Give four reasons for having a label control program.

18. If you notice non-approved labels being attached to product, the correct action is to:
- a. Retain all mislabeled containers and inform plant management.
  - b. Stop the labels from being attached until approval is received.
  - c. Require the labels to be removed before allowing operations to be resumed.
  - d. Stop all packing operations until your supervisor is contacted.
19. Select either the establishment or inspection is responsible for the following: (Mark the correct response with an "X".)

	Establishment	Inspection
Supplies the brands.	_____	_____
Supplies branding ink.	_____	_____
Maintains brand security	_____	_____
Applies markings to carcasses	_____	_____
Maintains brand inventory	_____	_____
Observes brand destruction when brands become worn	_____	_____

20. Label the 5 primal parts of the pork carcass below according to Reg 316.9.



21. Match the description with the proper official inspection legend. ( Regs 312 )

\_\_\_\_\_ 1 1/4 inch brand  
 \_\_\_\_\_ 1 3/4 inch (#1) brand  
 \_\_\_\_\_ For application to beef tails  
 \_\_\_\_\_ For application to pork loins  
 \_\_\_\_\_ For application to beef carcasses  
 \_\_\_\_\_ For application to sheep carcasses  
 \_\_\_\_\_ For application to goat carcasses  
 \_\_\_\_\_ For application to shipping  
 containers by mechanical means

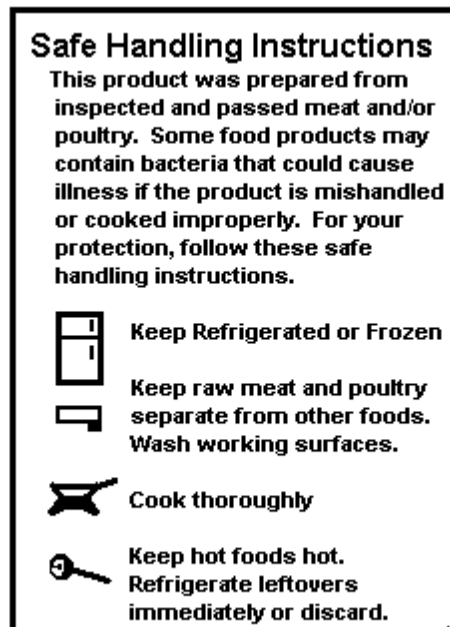
\_\_\_\_\_ 3/4 inch (#3) brand  
 \_\_\_\_\_ For application to beef livers  
 \_\_\_\_\_ For application to beef hearts  
 \_\_\_\_\_ For application to pork ribs  
 \_\_\_\_\_ For application to hog carcasses  
 \_\_\_\_\_ For application to calf carcasses  
 \_\_\_\_\_ For application to mule carcasses  
 \_\_\_\_\_ 2 1/2 inch brand for application to  
 the heavy paper that encloses a veal  
 carcass



22. Circle and name the features that are present on the following label.



23. Name the following label features and state when they are required.



**Keep Frozen**